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May 23, 2022

Honorable Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Jacob Daskal*, No. 21 Cr. 110 (NGG)

Dear Judge Garaufis:

We write on behalf of defendant Jacob Daskal in the above-referenced case. We respectfully write to seek leave of the Court to file an oversized brief in support of his pretrial motions. Specifically, Mr. Daskal has combined all of his pretrial motions into a single omnibus memorandum of law in support of multiple pretrial motions. The motions in this case, unlike others, involve complex legal and factual questions arising out of no fewer than four separate search warrant applications that were approved by state and federal court judges in two separate, but related criminal cases. Each search warrant application contains multiple Constitutional issues. As a result, the memorandum in support of the motions is longer than 25 pages.

We thank the Court for its consideration of this request.

Respectfully yours,

/S/ HEM
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cc: Counsel of Record (*via ECF*)